

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF DAKOTA

FIRST JUDICIAL DISTRICT

Case Type: CONTRACT

Church of the Nativity d/b/a Nativity
Episcopal Church,

Court File No.: 19HA-CV-21-1672

Plaintiff,

v.

**PLAINTIFF'S NOTICE OF MOTION AND
MOTION FOR REMOVAL FROM THE
EXPEDITED LITIGATION TRACK**

GuideOne Specialty Mutual Insurance
Company,

Defendant.

TO: DEFENDANT GUIDEONE SPECIALTY MUTUAL INSURANCE COMPANY, BY AND THROUGH ITS COUNSEL OF RECORD, LINDSEY DAVIS, ZELLE, LLP, 500 WASHINGTON AVENUE SOUTH, SUITE 4000, MINNEAPOLIS, MN 55415.

PLEASE TAKE NOTICE that on **September 21, 2021** at **9:00 a.m.**, or as soon thereafter as counsel may be heard before a Special Term Judge, via Remote Zoom video, Plaintiff Church of the Nativity d/b/a Nativity Episcopal Church will move the Court to remove the case from the Expedited Litigation Track, pursuant to ELT Rule 1(c) of the Special Rules for the Pilot Expedited Civil Litigation Track.

MOTION

Plaintiff Church of the Nativity d/b/a Nativity Episcopal Church, by and through its undersigned counsel, hereby moves this Court for an order granting Plaintiff's ELT 1(c) Motion to remove the case from the Expedited Litigation Track. This motion is based upon all of the files, records, and proceedings herein, Plaintiff's Memorandum of Law, and

supporting affidavits which will be served and filed in accordance with Special Rule 1(c) and Minn. R. Gen. Prac. 115.

SMITH JADIN JOHNSON, PLLC

Dated: June 9, 2021

By: /s/ Marcus P. Zelzer

Alexander M. Jadin (#387219)
Marcus P. Zelzer (#401944)
7900 Xerxes Avenue, Suite 2020
Bloomington, MN 55431
Telephone: (952) 388-0289
Facsimile: (612) 235-7927
ajadin@sjjlawfirm.com
mzelzer@sjjlawfirm.com

Attorneys for Plaintiff

MINNESOTA
JUDICIAL
BRANCH